

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff	§	
	§	
v.	§	Civil Action No.
	§	
\$40,051.00 IN UNITED STATES	§	
CURRENCY,	§	
Defendant in rem	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

1. United States of America, Plaintiff, files this action for forfeiture against approximately \$40,051.00 in United States currency, Defendant in rem, and alleges the following statements.

*Nature of the Action*

2. This is an action to forfeit property to the United States pursuant to 31 U.S.C. §5317(c)(2).

*Defendants in Rem*

3. Defendant in rem is approximately \$40,051.00 in United States currency that was seized from Ijeoma Jane Goredema on September 23, 2011, at the George Bush Intercontinental Airport in Houston, Texas.

*Jurisdiction and Venue*

4. This Court has jurisdiction under 28 U.S.C. §1355 because this is an action for forfeiture.

5. Venue is proper in this Court under 28 U.S.C. §§ 1355 and 1395(a) and (b) because:

- a. the acts or omissions giving rise to the forfeiture occurred in the Southern District of Texas,
- b. the property was found in the Southern District of Texas, and
- c. this forfeiture action accrued in the Southern District of Texas.

*Basis for Forfeiture*

6. The Defendant in rem is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) which provides that any property involved in violations of 31 U.S.C. §§ 5316 and 5324(c) may be forfeited to the United States. These statutes state that:

- 1) a person shall file a report when the person knowingly transports, is about to transport, or has transported a monetary instrument of more than \$10,000 out of the United States. 31 U.S.C. § 5316(a)(1)(A);
- 2) no person shall, for the purpose of evading the reporting requirements of 31 U.S.C. § 5316, fail to file a report required by 31 U.S.C. § 5316. 31 U.S.C. § 5324(c)(1);
- 3) no person shall, for the purpose of evading the reporting requirements of 31 U.S.C. § 5316, file a report required by 31 U.S.C. § 5316 that contains a material omission or misstatement of fact. 31

U.S.C. § 5324(c)(2).

*Facts*

7. On September 23, 2011, Ijeoma Jane Goredema was preparing to leave the United States aboard KLM Airlines flight # 662 en route to Amsterdam with a final destination of Nigeria at the George Bush Intercontinental Airport in Houston, Texas. In the jetway for this flight which contained posters advising passengers of the United States currency reporting requirements, United States Customs and Border Protection Officer (CBP Officer) Charlesworth Clarke conducted a routine outbound Customs inspection. The Officer Clarke asked Ms. Goredema if she was traveling with any other family members. Ms. Goredema said “no.” She said that she was traveling alone. Officer Clarke asked her if she was transporting more than \$10,000 in any monetary instruments for herself or anyone else. Ms. Goredema stated “no.” She said that she was transporting \$4,000.00. Officer Clarke explained to her the requirements of 31 U.S.C. § 5316 and the need to report accurately the currency amounts. At the request of Officer Clarke, Ms. Goredema verified in writing on the CBP form 503 that she was transporting \$4,000.00. Officer Clarke then directed her to an inspection table to verify the amount of funds that she was transporting.

8. At the inspection table, Officer Clarke asked Ms. Goredema to place all of

the currency that she was traveling with on the inspection table. Ms. Goredema stated that she had money on her person and that she needed privacy to remove it. Officer Danielle Hodge accompanied Ms. Goredema to a private location where Ms. Goredema removed from her person \$4,000.00.

9. Ms. Goredema placed on the inspection table her purse. Her purse was searched and in it was \$5,500.00. She next placed on the inspection table her carryon bag which contained a book. In that book, CBP Officers found \$4,000.00. She placed another carryon bag on the table. CBP Officers Clarke and Abdelqader Hamad inspected that bag. In that bag was a wallet that contained six envelopes. These envelopes contained the following sums of money: \$5,000.00, \$5,000.00, \$5,300.00, \$6,000.00, \$2,850.00, and \$2,400.00. CBP Officers found an additional \$1.00 on her person following a patdown search. CBP counted all of the funds found in the possession of Ms. Goredema and the total amount funds were \$40,051.00. CBP Officers seized the funds forfeiture.

10. In an interview with Special Agent Michelle Gonzalez, Homeland Security Investigations, Agent Gonzalez asked her why she did not declare the money. Ms. Goredema stated that she told the CBP Officer that she was carrying \$40,000.00 but did not correct him when he wrote \$4,000.00 on the CBP Form 503. She said that was her mistake and she should have corrected him.

*Relief Requested*

11. Plaintiff requests (a) an arrest warrant and summons pursuant to Rule G(3)(b)(ii), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, (b) a judgment of forfeiture, and (c) costs and other relief to which the Plaintiff may be entitled.

Date November 14, 2011.

Respectfully submitted,

Kenneth Magidson  
United States Attorney

By: s/ Albert Ratliff  
Albert Ratliff  
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*Verification*

I, Michelle Gonzalez, Special Agent, United States Homeland Security Investigations, declare under penalty of perjury as provided by 28 U.S.C. §1746 that I have read this Verified Complaint for Forfeiture in Rem, and the facts stated

in this complaint are true and correct to the best of my knowledge and belief.

Executed on November 14, 2011.



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Michelle Gonzalez, Special Agent  
United States Homeland Security Investigations